

Remarks

The present Amendment is responsive to the Final Office Action of April 29, 2005. Reexamination and reconsideration of claims 1-10, 12-19 and 21-23 is respectfully requested.

Summary of The Office Action

Claims 12-20 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent 6,115,739 to Ogawa et al.

Claims 1-10 and 21-23 were rejected under 35 U.S.C. 103(a) as being unpatentable over the combination of U.S. Patent 6,115,739 to Ogawa and U.S. Patent 6,825,942 to Kamiyama et al.

Claim 10 was rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent 6,115,739 to Ogawa.

The Present Claims Patentably Distinguish Over the References of Record

Independent Claim 1

Claim 1 has been amended to clarify that the device firmware is part of the scanning device and thus the scanning device is configured to store a link reference to the scanned imaging data in a centralized data store associated to the particular user.

The scanner taught by Ogawa does not store link references to the scanned imaging data. Ogawa uses dedicated directories that are created, not by the scanning device, but by administration software and by users. "A file for associating the data items with the directories is created in the designated directory by the administration software." (see column 4, lines 34-37). "Each user of the image scanner registers his/her own ID information in a directory associative file shown in FIG. 4 in advance." (see column 4, lines 46-49).

Thus, the scanner in Ogawa simply reads the directory information and user IDs from the associative file. The scanner does not store the directory information or the user IDs. Even if the claimed link references are interpreted as the user IDs (as the Office Action states, which the applicant disagrees with), the scanner does not store user IDs as claimed. This is performed by the user (see column 4, lines 46-49). Furthermore, there is no need for the scanner to store link references because the location of the imaging files is pre-determined and pre-assigned in the directory associative file shown in Figure 4.

Therefore, Ogawa fails to teach or suggest a scanning device that is configured to store link references in a centralized data store as recited in claim 1. Kamiyama fails to cure this shortcoming.

Since claim 1 recites features and has advantages not taught or suggested by references of record, claim 1 patentably distinguishes over references. Accordingly, dependent claims 2-10 also patentably distinguish over the references and are in condition for allowance.

Independent claim 12

Claim 12 has been amended to clarify that the claimed features are performed by the scanning device. Thus, the scanning device stores, in the composition store associated to the user, a link reference that identifies a location of the scanned imaging data.

The Office Action on page 5 interprets the claimed link reference to user IDs in Ogawa. As explained above, the scanner in Ogawa does not store user IDs but that each user stores their own ID in the directory associative file (see column 4, lines 46-49). Therefore, the claimed feature of storing is not taught or suggested by Ogawa.

Thus, Ogawa fails to teach or suggest a composition store and storing link references by the scanning device as claimed. Claim 12, thus, patentably distinguishes over Ogawa. Accordingly, dependent claims 13-19 also patentably distinguish over the Ogawa and are in condition for allowance.

Independent claims 21 and 22

Independent claims 21 and 22 are directed to computer program products that cause a scanning device to operate in the claimed manner. For example, claim 21 recites that the scanning device is caused to transfer a link to a composition store associated with the user. Claim 22 recites causing the link reference to be stored in a composition store (which is performed by the scanning device).

As explained above, Ogawa fails to teach or suggest a scanning device or any other means that causes a scanning device to operate in a manner that transfers links or stores link references as claimed in claims 21 and 22, respectively. Ogawa teaches a scanner that reads directory information and IDs from a file. Each user stores their own IDs in the file as explained previously. Furthermore, Kamiyama fails to cure the shortcomings of Ogawa.

Thus, Ogawa individually or in combination with Kamiyama fails to teach or suggest the recited features of independent claims 21 and 22. Thus, Claims 21 and 22 patentably distinguish over Ogawa and are in condition for allowance.

Conclusion

For the reasons set forth above, **claims 1-10, 12-19 and 21-23** patentably and unobviously distinguish over the references of record and are now in condition for allowance. An early allowance of all claims is earnestly solicited.

Respectfully submitted,

27-JUNE-2005



PETAR KRAGULJAC

Reg. No. 38,520

(216) 348-5843